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**ATTORNEYS FOR
INTERESTED NON-PARTY
DR. SARA GOEL**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the attached and foregoing instrument has this the day of July 2, 2020, been forwarded to all counsel of record by electronic mail pursuant to the Federal Rules of Civil Procedure.

BY: 
George Edwards III

DR. GOEL'S OBJECTIONS TO PLAINTIFFS' NON-PARTY SUBPOENA

General Objection: Non-Party Dr. Goel objects to the instructions accompanying Plaintiffs' Subpoena Duces Tecum to the extent that they purport to enlarge the scope of permissible discovery of Dr. Goel's duty to respond, if any, under the Federal Rules of Civil Procedure. In responding, Dr. Goel agrees only to comply with the Federal Rules of Civil Procedure. Dr. Goel also objects to all of Plaintiffs' Subpoena Definitions section, and specifically objects to the definition of Dr. Goel to include entities and persons who are not Dr. Goel. Dr. Goel specifically incorporates all objections made by Defendants in response to the Subpoena, and which were filed with the Court on July 1, 2020.

General Instruction: Non-Party Dr. Goel reserves the right to supplement all of these requests as discovery is ongoing. Additionally, Non-Party Dr. Goel asserts that she is not limited to only introducing the documents produced by any party in this case. Non-party Dr. Goel may produce additional documents as discovery is ongoing.

1. All Documents regarding all patients for whom you conducted an evaluation and/or performed an injection at P.A.I.N. or the Elite Entities. Documents responsive to this Request include, but are not limited to, each patient's complete medical records, test results, notes, bills, referrals for treatment, consultations, testing, sign-in sheets, prescriptions, orders, and any other documentation for each patient.

Response: Objection. This is overly broad and burdensome and would essentially call for Dr. Goel to turn over information not within her possession and gather evidence from everyone known source so as to try the entire case in this discovery response. Objection. This discovery is so broad and global as to amount to a mere fishing expedition, in contravention of the Rules of Civil Procedure. Objection. This request imposes an undue burden and cost on Dr. Goel and Plaintiffs have not taken steps to avoid imposing that burden. FRCP 45(d)(1), (d)(3)(A). Objection. This requires disclosure to privileged and protected information, and no exception or waiver applies. FRCP 45(d)(3)(A)(iii). Objection. This subpoena request requires production of electronically stored information from sources not reasonably accessible because of undue burden and cost. FRCP 45(e)(1)(D).

2. All Communications between You and anyone regarding any of the patients for whom you conducted an evaluation and/or performed an injection at P.A.I.N. or the Elite Entities.

Response: Objection. This is overly broad and burdensome and would essentially call for Dr. Goel to turn over information not within her possession and gather evidence from everyone known source so as to try the entire case in this discovery response. Objection. This discovery is so broad and global as to amount to a mere fishing expedition, in contravention of the Rules of Civil Procedure. Objection. This request imposes an undue burden and cost on Dr. Goel and Plaintiffs have not taken steps to avoid imposing that burden. FRCP 45(d)(1), (d)(3)(A). Objection. This requires disclosure to privileged and protected information, and no exception or waiver applies. FRCP 45(d)(3)(A)(iii). Objection.

This subpoena request requires production of electronically stored information from sources not reasonably accessible because of undue burden and cost. FRCP 45(e)(1)(D).

3. All agreements and/or contracts between You and any Defendant.

Response: Objection. This calls for irrelevant information. Objection. This request is duplicative of other discovery produced in this case.

4. All Documents reflecting any Payment that You made to or received from (1) any Defendant, (2) the Elite Entities, and/or (3) Rahil Roopani.

Objection. This calls for irrelevant information that does not bear upon any claim or defense in this case. Response: Objection. This is overly broad and burdensome and would essentially call for Dr. Goel to turn over information not within her possession and gather evidence from everyone known source so as to try the entire case in this discovery response. Objection. This discovery is so broad and global as to amount to a mere fishing expedition, in contravention of the Rules of Civil Procedure. Objection. This request imposes an undue burden and cost on Dr. Goel and Plaintiffs have not taken steps to avoid imposing that burden. FRCP 45(d)(1), (d)(3)(A). Objection. This requires disclosure to privileged and protected information, and no exception or waiver applies. FRCP 45(d)(3)(A)(iii). Objection. This subpoena request requires production of electronically stored information from sources not reasonably accessible because of undue burden and cost. FRCP 45(e)(1)(D).

5. All Communications with anyone regarding the solicitation, procurement, referral, or transportation of any patient at P.A.I.N. or the Elite Entities.

Objection. This calls for irrelevant information that does not bear upon any claim or defense in this case. Response: Objection. This is overly broad and burdensome and would essentially call for Dr. Goel to turn over information not within her possession and gather evidence from everyone known source so as to try the entire case in this discovery response. Objection. This discovery is so broad and global as to amount to a mere fishing expedition, in contravention of the Rules of Civil Procedure. Objection. This request imposes an undue burden and cost on Dr. Goel and Plaintiffs have not taken steps to avoid imposing that burden. FRCP 45(d)(1), (d)(3)(A). Objection. This requires disclosure to privileged and protected information, and no exception or waiver applies. FRCP 45(d)(3)(A)(iii). Objection. This subpoena request requires production of electronically stored information from sources not reasonably accessible because of undue burden and cost. FRCP 45(e)(1)(D).

6. All Communications with anyone providing marketing, advertising, management, consulting, patient referral, or transportation services on behalf of P.A.I.N. or the Elite Entities.

Objection. This calls for irrelevant information that does not bear upon any claim or defense in this case. **Response: Objection.** This is overly broad and burdensome and would essentially call for Dr. Goel to turn over information not within her possession and gather evidence from everyone known source so as to try the entire case in this discovery response. **Objection.** This discovery is so broad and global as to amount to a mere fishing expedition, in contravention of the Rules of Civil Procedure. **Objection.** This request imposes an undue burden and cost on Dr. Goel and Plaintiffs have not taken steps to avoid imposing that burden. FRCP 45(d)(1), (d)(3)(A). **Objection.** This requires disclosure to privileged and protected information, and no exception or waiver applies. FRCP 45(d)(3)(A)(iii). **Objection.** This subpoena request requires production of electronically stored information from sources not reasonably accessible because of undue burden and cost. FRCP 45(e)(1)(D).

7. All Documents and Communications between You and Rehan Memon, M.D. and/or Okezi, M.D. regarding any services provided for or on behalf of P.A.I.N. and/or the Elite Entities.

Objection. This calls for irrelevant information that does not bear upon any claim or defense in this case. **Response: Objection.** This is overly broad and burdensome and would essentially call for Dr. Goel to turn over information not within her possession and gather evidence from everyone known source so as to try the entire case in this discovery response. **Objection.** This discovery is so broad and global as to amount to a mere fishing expedition, in contravention of the Rules of Civil Procedure. **Objection.** This request imposes an undue burden and cost on Dr. Goel and Plaintiffs have not taken steps to avoid imposing that burden. FRCP 45(d)(1), (d)(3)(A). **Objection.** This requires disclosure to privileged and protected information, and no exception or waiver applies. FRCP 45(d)(3)(A)(iii). **Objection.** This subpoena request requires production of electronically stored information from sources not reasonably accessible because of undue burden and cost. FRCP 45(e)(1)(D).

8. All W-2s and Form 1099s issued to You from 2015 through the present reflecting payment for any services You performed for or on behalf of P.A.I.N and/or the Elite Entities.

Objection. This calls for irrelevant information that does not bear upon any claim or defense in this case. **Response: Objection.** This is overly broad and burdensome and would essentially call for Dr. Goel to turn over information not within her possession and gather evidence from everyone known source so as to try the entire case in this discovery response. **Objection.** This discovery is so broad and global as to amount to a mere fishing expedition, in contravention of the Rules of Civil Procedure. **Objection.** This request imposes an undue burden and cost on Dr. Goel and Plaintiffs have not taken steps to avoid imposing that burden. FRCP 45(d)(1), (d)(3)(A). **Objection.** This requires disclosure to privileged and protected information, and no exception or waiver applies. FRCP 45(d)(3)(A)(iii). **Objection.** This subpoena request requires production of electronically stored information from sources not reasonably accessible because of undue burden and cost. FRCP 45(e)(1)(D).